

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA, MIAMI DIVISION
Case No. 1:23-md-03076-KMM**

IN RE:

**FTX Cryptocurrency Exchange Collapse
Litigation**

THIS DOCUMENT RELATES TO:

FTX Insider Defendants

**JOINT MOTION FOR COURT APPROVAL
OF CONFIDENTIALITY AND PROTECTIVE ORDER**

Plaintiffs and Defendant Caroline Ellison (collectively, the “Parties”), jointly move the Court for entry of an order approving the Parties’ Joint Confidentiality and Protective Order and state:

1. The Parties agree and stipulate to entry of a protective order to cover the exchange of sensitive information in this case.
2. The Parties jointly move the Court for entry of an Order approving the Parties’ Joint Confidentiality and Protective Order.
3. This motion is filed by the Parties in good faith and not for purposes of delay. No party to this action will be prejudiced if this Court grants the relief sought herein.
4. Any other defendant to this litigation may execute an acknowledgement of confidentiality and agree to be bound by the Confidentiality and Protective Order.
5. Pursuant to Local Rule 7.1(a)(2), a proposed Order is attached for the Court’s convenience and a copy will be transmitted in Microsoft Word format via electronic of the Southern District of Florida.

WHEREFORE, the Parties jointly request that the Court issue an order approving the Parties' Joint Confidentiality and Protective Order (attached hereto as Exhibit A) and grant any other such relief as may be just and proper.

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1(a)(3), undersigned counsel for the respective Parties represent that the Parties are in agreement with respect to the relief requested herein.

Dated February 9, 2024

By: /s/ Adam Moskowitz

Adam M. Moskowitz
Florida Bar No. 984280
Joseph M. Kaye
Florida Bar No. 117520
THE MOSKOWITZ LAW FIRM, PLLC
Continental Plaza
3250 Mary Street, Suite 202
Coconut Grove, FL 33133
Office: (305) 740-1423
adam@moskowitz-law.com
joseph@moskowitz-law.com
service@moskowitz-law.com

By: /s/ Peter G. Neiman

Peter G. Neiman
Nicholas Werle
**WILMER CUTLER PICKERING
HALE & DORR LLP**
7 World Trade Center
New York, NY 10007
(212) 230-8800
peter.neiman@wilmerhale.com
nick.werle@wilmerhale.com

Attorneys for Caroline Ellison

David Boies
Alexander Boies
Brooke A. Alexander
BOIES SCHILLER FLEXNER LLP
333 Main Street
Armonk, NY 10504
914-749-8200
dboies@bsflp.com
aboies@bsflp.com
balexander@bsflp.com

Kerry J. Miller, La. Bar. No. 24562
Molly L. Wells, La. Bar. No. 36721
C. Hogan Paschal, La. Bar No. 38495
FISHMAN HAYGOOD L.L.P.
201 St. Charles Avenue, 46th Floor
New Orleans, Louisiana 70170-4600
(504) 586-5252; (504) 586-5250 fax

jswanson@fishmanhaygood.com
kmiller@fishmanhaygood.com
mwells@fishmanhaygood.com
hpaschal@fishmanhaygood.com

Counsel to Plaintiffs and the Putative Classes

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed on February 9, 2024 via the Court's CM/ECF system, which will send notification of such filing to all attorneys of record.

By: /s/ Adam Moskowitz
Adam Moskowitz